



## U.S. Department of Justice

United States Attorney  
Southern District of New York

The Jacob K. Javits Federal Building  
26 Federal Plaza  
New York, New York 10278

April 21, 2025

**BY ECF**

The Honorable Mary Kay Vyskocil  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

Re: U.S. v. Gonzales-Valdez et al., S1 25 Cr. 76 (MKV)

Dear Judge Vyskocil:

The Government respectfully requests that the Superseding (S1) Indictment in this matter be unsealed and that the Court schedule an arraignment and initial pretrial conference. The Government also respectfully moves for the exclusion of time under the Speedy Trial Act through the date of the initial pretrial conference. The exclusion of time is in the interest of justice because it will permit the Court to set an orderly schedule in this 21-defendant racketeering case, which involves some defendants who are expected to be arrested in multiple jurisdictions across the United States and who will need to be transported to the Southern District of New York. 18 U.S.C. § 3161(h)(1)(F), (h)(7)(A).

Respectfully submitted,

MATTHEW PODOLSKY  
Acting United States Attorney for the  
Southern District of New York

by: /s/  
Jun Xiang / Kathryn Wheelock / Timothy Ly  
Assistant United States Attorneys  
(212) 637-2289 / -2415 / -1062

**CC (ECF)**

All Counsel of Record

GRANTED.

The Indictment in this matter is UNSEALED.  
Arraignment in this matter is scheduled for April 30th at  
11:30.

SO ORDERED.

Date: 4/21/2025  
New York, New York

Mary Kay Vyskocil  
United States District Judge